

## Written evidence submitted by Manchester Airports Group (MAG) (COR0231)

### Overview

- 1.1 Manchester Airports Group (MAG) owns and operates Manchester, London Stansted and East Midlands airports. At pre-pandemic levels these airports supported the travel of more than 62 million passengers and the movement of over 733,000 tonnes of air cargo.
- 1.2 MAG welcomes the opportunity to respond to the Committee's call for evidence on the Home Office's preparedness for COVID 19. Our representation is focused on the Home Office's management of the border throughout the COVID 19 crisis, concerns raised, and how these concerns can be addressed.
- 1.3 While we recognise that UK Border Force's (UKBF's) primary role is as a security function, the border is also the first experience that all passengers have of the UK and its airports. It is therefore important for that experience to be as positive and welcoming as possible. As we recover from COVID 19, it is also important that the experience inspires confidence and feels COVID secure.
- 1.4 Across summer 2020, the experience that many passengers had at the border fell short of these expectations (see social media feedback). Low levels of resource at the border itself, coupled with a complicated Passenger Locator Form (PLF) at times caused crowding within border halls and reduced PLF compliance in ways that might otherwise have been avoided.
- 1.5 At MAG's airports over summer 2020 (July – September), when operating at only 21% of pre-pandemic levels, queue times for passengers were still at times double the agreed Service Level Agreement targets at key periods throughout the day.
- 1.6 As the UK begins to safely re-open its borders it is possible that measures used in summer 2020, like the PLF, and recently announced measures such as the checking of passenger test results before their entry into the UK, could again be detrimental to passenger experience and make social distancing more challenging. Therefore, MAG's recommendations are:

### Recommendations:

- a. **Passenger Locator Form Improvements:** Contract tracing and quarantine enforcement are understandably key components to managing the pandemic. However, doing so effectively requires UKBF to have the time and resource to check passenger's details and entry requirements. This requires a streamlined approach to COVID 19 'track and trace' requirements for international travel, through a simplified Passenger Locator Form.
  - b. **Increased Resourcing:** Passengers rightly want an efficient and effective border and MAG is committed to working with government to achieve this. However, with additional demands being placed on UKBF staff through PLF and testing checks, the Home Office needs to meet this demand with increased resourcing to minimise congestion at the border and any associated risks.
- 1.7 Beyond the COVID 19 pandemic and as the UK seeks to recover, the Home Office needs to better recognise the important role the border plays in the perceptions of passengers arriving in the UK.
  - 1.8 Existing service agreements, which allow passengers to wait up to 45 minutes to be processed by UKBF, do not meet the needs of a modern passenger or a modern, global economy. The Home Office has the right ambition in its 2025 Border Strategy (quoted below), but it is important too that steps are taken towards improving services ahead of 2025.

*"Our ambition is to deliver the most streamlined and competitive Service Level Agreements (SLAs) we can, using advanced data and modern technologies, such as data analytics and biometrics, to reduce average transaction times for low-risk traffic as much as possible, whilst maintaining core border security functions. Traditionally SLAs are associated with passenger and goods wait times which are currently measured differently across different ports. We will shift this focus towards service delivery standards that will include clearance for people and goods traffic." – 2025 UK Border Strategy, p70<sup>1</sup>*

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945380/2025\\_UK\\_Border\\_Strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945380/2025_UK_Border_Strategy.pdf)

- 1.9 MAG is committed to supporting Government in delivering this ambition. However, funding for the improved border services the UK needs in the future must come from Government itself, recognising the role Government must always play in policing the UK's borders and delivering the service levels required for Global Britain.

### Passenger Locator Form

- 2.1 Due to the importance of contact tracing and quarantine enforcement to control the spread of COVID 19, it is essential the Home Office maintains a robust but simple approach to the PLF. Whilst the process is important to controlling the spread of COVID 19 at international gateways, the PLF has been complex and long-winded for both passengers and airport operators.
- 2.2 We recommend a full review and redesign of the PLF from the bottom-up. This is to ensure the government can readily collect the specific information they require, whilst also improving customer experience. The UK's PLF process requires 16 pages of information to be populated by arriving passengers, contrasting with entry form processes in European countries such as Greece and Poland which require the completion of much shorter and simpler entry forms. Passengers were also waiting until arrival back into the UK to complete the PLF further adding to congestion.
- 2.3 Due to the dramatic reduction in flights, we are concerned that any disruption or congestion recorded in 2020 at the border provides an inaccurate representation of how the process would work during a 'business as usual' scenario. Though UKBF met EU, Non-EU and E-Gate SLA targets in July and August, EU passengers experienced at peak maximum queue times double of set targets. In addition, in September UKBF fell below the SLA target for Non-EU passenger queue times. However, this is not reflected in SLA targets. Issues are heightened at peak arrival times, however, this was still c.80% below normal levels.

### Immigration maximum wait times July – September

| Type    | SLA Target | July     | August   | September |
|---------|------------|----------|----------|-----------|
| E-Gates | 00:25:00   | 00:42:50 | 00:24:35 | 00:21:26  |
| EU      | 00:25:00   | 00:53:03 | 00:57:25 | 01:10:22  |
| Non-EU  | 00:45:00   | 01:05:00 | 01:04:59 | 01:19:16  |

- 2.4 The combined effects of Passenger Locator Forms, pre-departure testing requirements and Brexit changes to border experience will increase processing times and risk passenger confusion in the short term. As passenger volumes begin to return, this could result in increased congestion and delay at the border unless improvements and additional resourcing is put in place. Given space at the border is limited, congestion will be created and will reduce opportunities for social distancing.
- 2.5 Therefore, all mechanisms to control the spread of COVID 19 must be designed to be focus on capturing all required contact information as simply and efficiently as possible, to avoid creating congestion at the border. Just as importantly, due to the increased processing and time needed for passengers to pass through UK Border Control due to COVID 19 controls, it is essential UKBF is suitably resourced for this increased demand.

Finally, we recognise Government efforts to reduce the impact of the lengthy PLF form by attempting to move PLF checks upstream to the origin airport. This is a positive step but no substitute for a simplified form, which is the cause of concern.

### UK Border Force Resourcing and Management

- 3.1 The protection and management of the border is the responsibility of the state. The government has set out its vision for the future border but in the immediate term, the Brexit transition plus COVID 19 has resulted in additional checks and tests at the border.
- 3.2 The government needs to ensure UKBF is funded adequately to provide the resources needed to operate the border effectively under these new conditions. Without adequate funding, border

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congestion will occur, resulting in negative perceptions of the UK from international arrivals and a poor experience for UK residents. An efficient and effective border is a critical component of Global Britain, that is able to support international trade, investment and tourism.

- 3.3 Failures in managing border congestion during the pandemic has resulted in negative media coverage, undermining the government's public health messaging, and leading to criticism of airports, even though the border is a state responsibility.
- 3.4 The government needs to ensure that a high-quality operational level is set as a baseline for the border to support Global Britain. This will then allow airports and other international gateways to work collaboratively with government to develop and fund innovative border solutions that can provide enhanced service for passengers beyond the high-quality baseline standard.
- 3.5 There is an opportunity, with current low passenger volumes and following Brexit, to re-evaluate service level agreements and performance measurement, and ensure these better reflect actual passenger experience at the border. This will ensure a high-quality baseline is actually delivered, and will form the foundation for any additional investment in the border by airports.

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**Social Media Feedback:**

 [Redacted] · Sep 9

The UK Covid measures are a joke. Arrived back in the UK last night. Filled in all the on-line forms, printed off 5 pages as instructed. Arrived at @manairport. No checks on forms, no temperature checks, no instructions to isolate. Ushered through automatic passport gates.

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 **Manchester Airport** @manairport · Sep 9

Hi Bob. The **Passenger Locator Form** checks are carried out by UK Border Force, on behalf of the UK Government. We advise directing any concerns you may have to them. Thank you.

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 [Redacted] · Sep 10

We arrived back last week and travelled through Manchester. I completed the travel locator forms, but I know others on the plane did not and there was no one checking them at airport!! It was a bit of a shock.

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 **Manchester Airport** @manairport · Sep 10

Hi Joe. The Passenger Locator Form checks are carried out by UK Border Force, on behalf of the UK Government. We advise directing any concerns you may have to them. Thank you.

**February 2021**